Application No.: 10/005,152

## **REMARKS**

Applicant has cancelled claims 1, 17, and 22, and amended claims 2, 15, 18, 23, and 31. Accordingly, claims 2-16, 18-21, and 23-34 are currently pending in the application, of which claims 2, 18, and 23 are independent claims. Applicant appreciates the indication that claims 2-14, 23-30, and 33-34 contain allowable subject matter.

In view of the following remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

## Rejections Under 35 U.S.C. §102

Claims 1, 15-18, 22, and 31-32 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,580,408 issued to Bae, *et al.* ("*Bae*"). Applicant respectfully traverses this rejection for at least the following reasons.

With regard to claims 1, 17, and 22, the claims have been cancelled, and thus the rejection is moot.

With regard to claims 15-16, these claims now depend from claim 2, which the Examiner agrees is allowable. Because they recite additional features, however, claims 15-16 may be separately patentable for those additional features. Similarly, with regard to claims 31-32, these claims now depend from claim 23, which the Examiner agrees is allowable. Because they recite additional features, however, claims 31-32 may be separately patentable for those additional features.

With regard to claim 18, this claim has been amended to place it independent form and to correct a typo. As amended, the claim recites "initializing the voltage supplied to the gate of the

current driving TFT in response to a control signal." The cited reference does not teach at least these features. Accordingly, the cited reference does not anticipate the claim.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(e) rejection of claims 1, 15-18, 22, and 31-32. Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicant respectfully submits that independent claims 2, 18, and 23, and all the claims that depend from them are allowable.

## Rejections Under 35 U.S.C. §103

Claims 19-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Bae* in view of U.S. Patent No. 6,229,508 issued to Kane ("*Kane*"). Applicant respectfully traverses this rejection for at least the following reasons.

In order to render a claim obvious, the combination of cited references must teach each and every element of the claimed invention and must provide teaching, motivation or suggestion to combine. Nat'l Steel Car, Ltd. v. Canadian Pac. Rwy., 357 F.3d 1319, 1337 (Fed. Cir. 2004) (citing Ecolochem, Inc. v. S. Cal. Edison Co., 227 F.3d 1361, 1371 (Fed. Cir. 2000)). This motivation must be based on the knowledge in the art, not knowledge provided by the application under examination, because such hindsight reconstruction is forbidden. In re Fine, 837 F.2d 1071, 1075 (Fed. Cir. 1988).

With regard to claims 19-21, the Examiner admits that *Bae* does not teach that the control signal is an external reset signal. The Examiner asserts *Kane* remedies this deficiency of *Bae*. The Examiner does not provide any teaching, motivation, or suggestion to combine the references. Without teaching, motivation, or suggestion to combine the references, it is improper to combine the references, and thus the combination does not render the claims obvious.

Assuming, however, that there were teaching, motivation, or suggestion to combine the references, there is no indication that *Kane* remedies the deficiencies of *Bae* with regard to independent claim 18 (explained above) from which claims 19-21 depend. Accordingly, the combination of *Bae* and *Kane* does not render claims 19-21 obvious.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of claims 19-21. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicant respectfully submits that independent claim 18, and all the claims that depend from it are allowable.

## Allowable Subject Matter

Applicant appreciates the indication that claims 2-14, 23-30, and 33-34 contain allowable subject matter. Applicant has amended claims 2 and 23 to put them in independent form.

Accordingly, Applicant submits that claims 2-14, 23-30, and 33-34 are in condition for allowance.

Oh-Kyong KWON

Application No.: 10/005,152

**CONCLUSION** 

Applicant believes that a full and complete response has been made to the pending Office

Action and respectfully submits that all of the stated objections and grounds for rejection have

been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending

claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this

response, the Examiner is invited to contact the Applicant's undersigned representative at the

number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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